

TROY BANK & TRUST, JOHN RAMAGE

Proposal and Comment Information

Title: Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies (Reg O and Y), R-1896

Comment ID: FR-2026-0028-01-C46

Submitter Information

Organization Name: Troy Bank & Trust

Organization Type: Company

Name: John Ramage

Submitted Date: 10/27/2026

Please find the attached comment letter from Troy Bank & Trust.



October 27, 2026

VIA ELECTRONIC SUBMISSION

Benjamin W. McDonough, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Docket No R-1896 | RIN: 7100-AH27

Re: Proposed Rulemaking on Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks (Regulation O; 12 CFR Part 215)

Dear Secretary McDonough:

As Chief Administrative Officer of Troy Bank & Trust, a \$1.6 billion community bank that has proudly served Southeast Alabama since 1906, I appreciate the opportunity to comment on the proposal to modernize Regulation O standards on extending credit to bank executives, board members, and major shareholders. Our customers include families, small businesses, farmers, educators, healthcare professionals, and local industries that depend on strong community relationships and local decision-making.

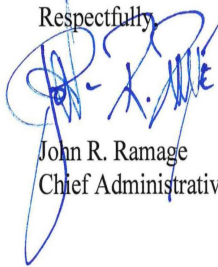
Regulation O plays an important role in preserving public confidence in the banking system by promoting transparency, fairness, and sound governance in transactions involving insiders. For community banks, where directors and executive officers are often deeply involved in the communities they serve, these safeguards help ensure that lending decisions remain impartial, are made on substantially the same terms available to other customers and are free from preferential treatment. The rule has long served as an effective framework for managing insider credit risk while reinforcing the trust that customers, shareholders, and regulators place in community financial institutions.

The proposed revisions to Regulation O reflect a balanced and pragmatic modernization of the rule that reduces unnecessary administrative burden while maintaining strong credit discipline, effective supervisory oversight, and robust safeguards against insider risk. By allowing institutions to focus compliance resources on transactions that present meaningful risk rather than immaterial activities, the proposal enhances the overall effectiveness of Regulation O. Furthermore, the proposal preserves the core principles and protections that have made Regulation O an important component of safe and sound banking practices. I strongly encourage the Federal Reserve Board and the FDIC to adopt the proposed rule as finalized and without delay.

Benjamin W. McDonough
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Thank you for considering our comments and for your continued commitment to supporting the critical role community banks play in serving their customers and local economies. I appreciate the opportunity given by the Federal Reserve and FDIC to provide input on this important proposal.

Respectfully,

A handwritten signature in blue ink, appearing to read "John R. Ramage", is written over the typed name and title.

John R. Ramage
Chief Administrative Officer